

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ANGEL MANUEL DIAZ ROSARIO

DEBTOR

CASE NO. 22-02706 EAG

CHAPTER 13

**DEBTOR'S MOTION REQUESTING EXTENSION OF TIME TO FILE CHAPTER
13 SCHEDULES AND PLAN AND OTHER REQUIRED DOCUMENTS**

TO THE HONORABLE COURT:

COMES NOW, ANGEL MANUEL DIAZ ROSARIO, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On September 12, 2022, the Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code, 11 U.S.C. Sections 1301 *et. seq.*

2. That the aforementioned bankruptcy filing was an "emergency filing" since a residential real property owned by the Debtor located at Estancias de Bairoa Caguas, Puerto Rico, was scheduled for a public auction for September 13, 2022.

3. That after the bankruptcy petition was filed, the Debtor had to attend to personal/family matters and was unable to meet with his undersigned attorney in order to prepare and file the pending documents, schedules and Chapter 13 Plan, in the above captioned case.

4. That on this same date, October 12, 2022, the Debtor personally met with his attorney and is obtaining/preparing the required documents and thus, respectfully requests additional time within to file the aforementioned schedules, statements and plan.

5. That the Debtor needs fourteen (14) days to prepare and file the pending chapter 13 schedules, statement of financial affairs, payment advices, statement of current monthly income and disposable income calculation Forms 122C-1 and 122c-2, and the Chapter 13 Plan, pursuant to Rule 1007(c) and 3015 of the Federal Rules of Bankruptcy Procedure. This extension of time to expire on October 26, 2022.

WHEREFORE, the Debtor respectfully prays that the present motion be granted and that this Honorable Court grant the requested extension of time.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee Jose Ramon Carrion Morales, Esq.; to the US Trustee's Office, Monsita Lecaroz Arribas, Esq., Assistant US Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non-participant: to the Debtor, Angel Manuel Diaz Rosario, Urb Estancias de Bairoa A 3 Bromelia Street Caguas PR 00725, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 12th day of October, 2022.

/s/ **Roberto Figueroa Carrasquillo**
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
PO BOX 186 CAGUAS PR 00726-0816
TEL 787-744-7699; 787-963-7699
EMAIL: rfc@rfigueroalaw.com